

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Chapter 11

Case No. 21-30589 (MBK)

Judge: Michael B. Kaplan

AYLSTOCK, WITKIN, KREIS & OVERHOLTZ,
PLLC,

Appellants,

v.

LTL MANAGEMENT LLC,

Appellee.

Case No. 22-cv-1280-FLW

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**DEBTOR’S DESIGNATION OF ADDITIONAL ITEMS TO BE INCLUDED IN THE
RECORD ON APPEAL**

LTL Management LLC, debtor in the above-captioned case and appellee, pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedures, hereby submits its designation of additional items to be included in the record on appeal, in addition to those designations submitted by Aylstock, Witkin, Kreis & Overholtz, PLLC (“Aylstock”) in its *Statement of Issues, Designation of Items to be Included in the Record on Appeal, and Certificate Regarding Transcripts* (Dkt. 1801), in connection with Aylstock’s appeal to the United States Bankruptcy Court for the District of New Jersey from (1) the March 2, 2022 *Order Denying Motions to Dismiss* (“MTD Order”) (Dkt. 1603)² and the related February 25, 2022 *Memorandum Opinion* (“MTD Opinion”) (Dkt. 1572), collectively “*MTD Opinion and Order*”, and (2) the March 7, 2022 *Order (I) Declaring that Automatic Stay Applies to Certain Actions Against Non-Debtors and (II) Preliminarily Enjoining Certain Actions* (“*Stay Order*”) (Dkt. 1635) and the related February 25, 2022 *Memorandum Opinion* (“*Stay Opinion*”) (Dkt. 184, Adv. Pro. No. 21-03032-MBK), collectively “*Stay Order and Opinion*”) (hereinafter “Aylstock Appeals”).

Background

1. On March 25, 2022, Arnold & Itkin LLP filed *Appellant’s Statement of the Issues to be Presented on Appeal and Designation of the Record on Appeal* (Dkt. 1856, Case No. 12 22-cv-1387-FLW), designating items to be included in the record on appeal in connection with its

² “Dkt.” shall refer to entries in the Main Case docket (21-30589-MBK) and “Dkt. []”, Adv. Pro. No. 21-03032-MBK” shall refer to entries in the adversary proceeding.

appeal to the United States Bankruptcy Court for the District of New Jersey from the *MTD Order* based on the *MTD Opinion* (hereinafter “Arnold & Itkin Appeal”).

2. On March 23, 2022, the Official Committee of Talc Claimants I (“TCC I”) filed *Appellant TCC I’s Statement of Issues on Appeal and Designations of Items to be Included in the Record on Appeal as to MTD Opinion and Order* (Dkt. 1832, Dkt. 1833, Case Nos. 22-cv-1339-FLW, 22-cv-1350-FLW, and 22-cv-1620-FLW) and *Appellant TCC I’s Statement of Issues on Appeal and Designation of Items to be Included in the Record on Appeal as to Stay Opinion and Order* (Dkt. 1833, Dkt. 1833, Case Nos. 22-cv-1339-FLW, 22-cv-1350-FLW, and 22-cv-1620-FLW), both designating items to be included in the record on appeal in connection with its appeal to the United States Bankruptcy Court for the District of New Jersey from the *MTD Opinion and Order* and the *Stay Opinion and Order* (hereinafter “TCC I Appeals”).

3. On March 21, 2022, the Official Committee of Talc Claimants II (“TCC II”) filed *Appellants’ Statement of Issues to be Presented on Appeal* (Dkt. 1805) and *Appellants’ Designation of Items to be Included in the Record on Appeal* (Dkt. 1804, Case Nos. 22-cv-01289-FLW, 22-cv-1296-FLW, and 22-cv-01303-FLW), the latter designating items to be included in the record on appeal in connection with its appeal to the United States Bankruptcy Court for the District of New Jersey from the *MTD Order* and the *Stay Order* (hereinafter “TCC II Appeals”).

4. On March 21, 2022, Aylstock filed *Statement of Issues, Designation of Items to be Included in the Record on Appeal, and Certificate Regarding Transcripts* (Dkt. 1801, Case Nos.

22-cv-1280-FLW and 22-cv-1292-FLW), designating items to be included in the record on appeal in connection with the Aylstock Appeals.

Additional Items

5. In the Aylstock Appeals, LTL Management LLC hereby designates all items designated by Arnold & Itkin in the Arnold & Itkin Appeal, by TCC I in the TCC I Appeals, and/or by TCC II in the TCC II Appeals, but not designated by Aylstock in the Aylstock Appeals.

Dated: April 4, 2022

WOLLMUTH MAHER & DEUTSCH LLP

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